

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

JOE MITCHELL DORSEY,)	
)	
Plaintiff,)	
)	
V.)	CIVIL ACTION NO. 2:05-CV-1239-F
)	
MUNICIPAL COURT ANDALUSIA,)	
et al.,)	
)	
Defendants.)	

MOTION FOR EXTENSION OF TIME TO FILE SPECIAL REPORT

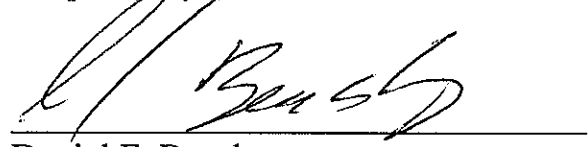
Comes now the defendant, Annette King, RN, and hereby moves this Court for an extension of time within which to file its Special Report. As grounds for said motion, defendant King hereby sets down and assigns the following:

1. On January 13, 2006 this Court entered an Order for Special Report. Said Order requires that the defendant submit a special report to this Court within 40 days.
2. Defendant King has been attempting to gather the information required by the Court to complete the special report but anticipates that it the unavailability of several of personnel who provided health care services to the plaintiff and the scope

of the investigation and defenses will make it impossible to complete her special report in the time prescribed by the Court's order.

WHEREFORE, defendant King is requesting a 60 day extension within which to complete its investigation and prepare the special report as directed by this Court.

Respectfully submitted,



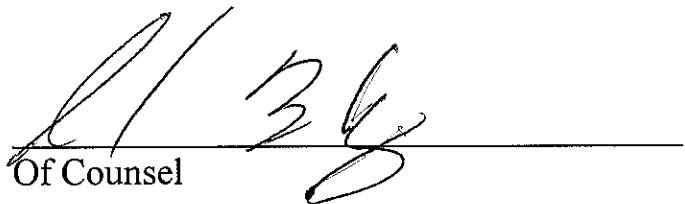
Daniel F. Beasley

LANIER FORD SHAVER & PAYNE P.C.
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P.O. Box 2087
Huntsville, Alabama 35804
(256) 535-1100

CERTIFICATE OF SERVICE

I hereby certify that on this the 3rd day of January, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and I hereby certify that I have mailed by United States Mail, postage prepaid, the document to the following non-CM/ECF participant:

Joe Mitchell Dorsey
Covington County Jail
290 Hillcrest Drive
Andalusia, AL 36420



Of Counsel